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7 Attorney for Leonard James Shove

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 LEONARD JAMES SHOVE,  
15 Defendant.

Case No. 2:23-cr-00195-CDS-BNW

**STIPULATION TO CONTINUE  
REPLY TO MOTION TO SUPPRESS  
(ECF 20)**  
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Jean Ripley, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Aden Kahssai,  
20 Assistant Federal Public Defender, counsel for Leonard James Shove, that the reply to the  
21 motion to suppress (ECF 20) currently due July 1, 2024 be extended to July 8, 2024.

22 The Stipulation is entered into for the following reasons:

- 23 1. Defense needs additional time to consider the government's offer and discuss  
24 negotiations.  
25 2. The defendant is incarcerated and does not object to the continuance.  
26 3. The parties agree to the continuance.

1           4.       The additional time requested herein is not sought for purposes of delay, but  
2 merely to allow counsel for defendant sufficient time within which to be able to effectively and  
3 complete investigation of the discovery materials provided.

4           5.       Additionally, denial of this request for continuance could result in a miscarriage  
5 of justice. The additional time requested by this Stipulation is excludable in computing the time  
6 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United  
7 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,  
8 Section 3161(h)(7)(B)(i), (iv).

9           This is the second stipulation to continue filed herein.

10          DATED this 27th day of June, 2024.

11       RENE L. VALLADARES  
12       Federal Public Defender

JASON M. FRIERSON  
United States Attorney

13       By: Aden Kahssai

By: Jean Ripley

14       ADEN KAHSSAI  
Assistant Federal Public Defender

JEAN RIPLEY  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

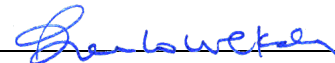
3 UNITED STATES OF AMERICA,  
4  
5 Plaintiff,  
6 v.  
7 LEONARD JAMES SHOVE,  
8 Defendant.

Case No. 2:23-cr-00195-CDS-BNW

9  
10 **ORDER**

11 IT IS THEREFORE ORDERED that the reply to the motion to suppress (ECF 20)  
12 currently due July 1, 2024 be extended to July 8, 2024.

13 DATED this 28 day of June, 2024.

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16 UNITED STATES MAGISTRATE JUDGE  
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